

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**DAVID C. BEINLICH and** : **No. \_\_\_\_\_**  
**KAREN F. BEINLICH,** :  
 : **[Filed Electronically]**  
 :  
 **Plaintiffs,** :  
 :  
 :  
 **vs.** :  
 :  
 :  
 **CHIEF EXPLORATION &** :  
**DEVELOPMENT LLC, et al.,** :  
 :  
 :  
 **Defendants.** :

**NOTICE OF REMOVAL**

Defendant Chief Exploration & Development LLC (“Chief”) hereby serves notice that it is removing this action from the Court of Common Pleas of Sullivan County, Pennsylvania, to the United States District Court for the Middle District of Pennsylvania.

1. Plaintiffs David C. and Karen F. Beinlich filed a complaint in the Court of Common Pleas of Sullivan County, Pennsylvania, on March 14, 2011. A copy of the complaint is attached at Tab “A.” To Chief’s knowledge, this is the only document filed of record in the state court.

2. The complaint names Chief and The Keeton Group, LLC, as defendants.

3. Plaintiffs are citizens of Pennsylvania.

4. All of the defendants are citizens only of states or commonwealths other than Pennsylvania.

5. Plaintiffs seek (among other things) an order to quiet title by declaring that an oil-and-gas lease has expired.

6. The relief sought by Plaintiffs has a value exceeding the sum or substance of \$75,000.00.

7. Plaintiffs could originally have filed their suit in this Court. *See* 28 U.S.C. § 1332.

8. This case is accordingly removable to this Court. *See* 28 U.S.C. § 1441.

March 28, 2011

Respectfully submitted,

**K&L GATES LLP**

s/ David R. Fine

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**CERTIFICATE OF SERVICE**

I certify that, on March 28, 2011, I served a copy of the attached document on the following by U.S. Mail, postage prepaid:

Christian Lovecchio, Esq.  
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s/ David R. Fine

David R. Fine